

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
Caption in compliance with D.N.J. LBR 9004-2(c)

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Creditors

In re:

LTL MANAGEMENT LLC

Debtor.

Case No. 21-30589 (MBK)
Chapter 11
Judge: Hon. Michael B. Kaplan,
C.U.S.B.J.

**VERIFIED STATEMENT PURSUANT TO RULE 2019 OF THE
FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Undersigned counsel for the proposed representative plaintiff (“**Baker**”) in the action styled *Baker v Johnson & Johnson*, Ontario Superior Court of Justice (“**Ontario Court**”) (Court File No. CV-16-553046CP) (“**Baker Action**”), on behalf of Howie, Sacks & Henry, LLP and Rochon Genova LLP (collectively, “**Canadian Counsel**”), file this Verified Statement (“**Rule 2019 Statement**”) pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure and the Court’s *Order Compelling Compliance with Fed. R. Bankr. P. 2019* entered on May 25, 2022

(Docket No. 2352) (“**Rule 2019 Order**”). In support of the Verified Statement, counsel represents as follows:

STATEMENT

1. Canadian Counsel has been retained by Baker and certain plaintiffs in the Baker Action (collectively, the “**Baker Plaintiffs**”) as identified on the attached **Exhibit A**.

2. The claims of the Baker Plaintiffs are currently unliquidated and arise out of, among other things, the development, testing, design, manufacturing, licensing, distribution, marketing and sale of JOHNSON’S® Baby Powder by the defendants in the Baker Action (collectively, the “**Talc-Related Activities**”).

3. Attached as **Exhibit B** is a true and correct redacted copy of the engagement agreement between Canadian Counsel and Baker authorizing Canadian Counsel to assert claims on behalf of Baker for Talc-Related Activities. The agreement is substantially identical in form and substance to the agreements between the remaining Baker Plaintiffs and Canadian Counsel.¹

4. Pursuant to the Rule 2019 Order, this Rule 2019 Statement is being filed under seal.

5. The Baker Plaintiffs reserve the right to amend, supplement or otherwise modify this Rule 2019 Statement.

6. Nothing in this Rule 2019 Statement shall be construed as a waiver or release of any claims or rights that the Baker Plaintiffs may have against the Debtor or its affiliates, or otherwise in this bankruptcy case, all of which are expressly reserved.

7. To the best of counsel’s knowledge, neither Canadian Counsel nor the undersigned counsel hold any claim against, or own any interest in, the Debtor.

¹ Redacted copies of the other engagement agreements may be provided upon reasonable written request.

Dated: June 8, 2022

By: /s/ Jeffrey A. Cooper

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